

Supply Chain Due Diligence Reporting

Preamble:

The WINDIAM group has aligned its Supply Chain Due Diligence communication and reporting on RJC's Guidance for this subject. As a result, this document recaps the reporting requirements for Tier 1 and downstream companies (WINDIAM's position in the diamond supply chain).

Reporting:

1. Management Systems:

The WINDIAM group has created a Supply Chain Policy document which has been sent to all its suppliers. The Management responsibility for the due diligence program has been assigned to WINDIAM's Executive Director, and adequate record-keeping systems and processes for information collection have been installed as per the Company's procedures for this subject.

2. Risk Assessment:


In preparation of its RJC Audit, the WINDIAM group has engaged with all its suppliers by sending them its Supply Chain Policy and a Due Diligence Questionnaire, both accompanied by an explanatory letter on RJC's COP 7 and the Company's obligations in this respect. To date, the majority of suppliers have sent this questionnaire back, and the Company strives for 100% completion of supplier-response.

3. Response:


To date, no specific risks have been identified in our supply chain, as such, no specific extra steps needed to be undertaken by the Company to manage risks, monitor and track performance of risk mitigation or to follow up any specific risk-areas.

Antwerp, September 24th, 2025



Gon Raz,
Executive Director, Windiam N.V.



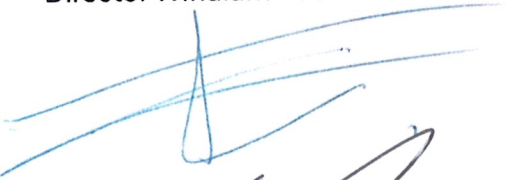
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